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Attorneys for Intervenors and Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDERS
INCORPORATED, and A.J. MADISON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as
Director of Oregon Health Authority,
DOLORES MATTEUCCI, in her official
capacity as Superintendent of the Oregon
State Hospital,

Defendants,

and

Case No. 3:02-cv-00339-MO (Lead Case)
Case No. 3:21-cv-01637-MO (Member Case)
Case No. 6:22-cv-01460-MO (Member Case)

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' MOTION TO CLARIFY
ORDER ON INTERVENTION**

4867-5863-6871.1

UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' MOTION TO
CLARIFY ORDER ON
INTERVENTION

1

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LEGACY EMANUEL HOSPITAL &
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FOR BEHAVIORAL HEALTH, LEGACY
HEALTH SYSTEM, PEACEHEALTH,
PROVIDENCE HEALTH & SERVICES –
OREGON, and ST. CHARLES HEALTH
SYSTEM,

Intervenors.

METROPOLITAN PUBLIC DEFENDERS
INCORPORATED, JAROD BOWMAN,
JOSHAWN DOUGLAS-SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of
the Oregon State Hospital, in her individual
and official capacity, PATRICK ALLEN,
Director of the Oregon Health Authority, in
his individual and official capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH, LEGACY
HEALTH SYSTEM, PEACEHEALTH,
PROVIDENCE HEALTH & SERVICES –
OREGON, and ST. CHARLES HEALTH
SYSTEM,

Intervenors.

Case No. 3:21-cv-01637-MO (Member Case)

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY
HEALTH SYSTEM; PEACEHEALTH;
PROVIDENCE HEALTH & SERVICES –
OREGON, and ST. CHARLES HEALTH
SYSTEM

Plaintiffs,

v.

Case No. 6:22-cv-01460-MO (Member Case)

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2

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PATRICK ALLEN, in his official capacity as
Director of Oregon Health Authority,

Defendant.

LR 7-1 CERTIFICATION

Pursuant to LR 7-1(a), counsel for Legacy Emanuel Hospital & Health Center d/b/a Unity Center for Behavioral Health, Legacy Health System, PeaceHealth, Providence Health & Services – Oregon, and St. Charles Health System (“Intervenor-Plaintiffs”) certify that they have conferred with counsel for Plaintiffs and Defendants in the *Mink-Bowman* matter, and no party opposes this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b)(1), Intervenor-Plaintiffs respectfully request an extension of time to January 26, 2023 to respond to Disability Rights Oregon and Metropolitan Public Defender’s (“*Mink* Plaintiffs”) Motion to Clarify Order on Intervention. In support of this motion, Intervenor-Plaintiffs state as follows.

1. On December 22, 2022, Oregon Health Authority, Defendants in the *Legacy* matter filed a Motion to Dismiss. On December 23, 2022, *Mink* Plaintiffs filed a Motion to Clarify Order on Intervention in the *Mink-Bowman* matter.
2. The current due date for the response to the Motion to Dismiss is January 26, 2023. The current due date for the response to the Motion to Clarify Order on Intervention, pursuant to the Court’s rules, is January 6, 2023.
3. Intervenor-Plaintiffs seek an extension from January 6, 2023 to January 26, 2023 to respond to Plaintiffs’ Motion to Clarify Order on Intervention.
4. This extension will allow Intervenor-Plaintiffs to file their response to the Motion to Clarify Order on Intervention at the same time as the response to Oregon Health Authority’s Motion to Dismiss. This extension will provide adequate time for Intervenor-Plaintiffs and

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3

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counsel to prepare a proper responsive pleading.

5. This motion is brought in good faith and not for the purpose of undue delay.

6. Counsel for Plaintiffs and Defendants have confirmed that this motion is not opposed.

CONCLUSION

For the reasons discussed, Intervenor-Plaintiffs respectfully request that the Court grant an extension from January 6, 2023 to January 26, 2023 to respond to the Motion to Clarify Order on Intervention.

DATED this 4th day of January, 2023.

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Attorneys for Intervenors and Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of January, 2023, I electronically filed the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION TO CLARIFY ORDER ON INTERVENTION** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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